

REMARKS

Claims 1 – 28 and 30 remain pending in the instant application. All claims presently stand rejected. Claims 1, 3, 5, 10, 14, 19, 21, 23, 28, and 30 are amended herein. Claims 29 and 31-33 are hereby cancelled without prejudice. Entry of this amendment and reconsideration of the pending claims are respectfully requested.

Claim Rejections – 35 U.S.C. § 103

Claims 1- 33 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Kashima et al (US 5,485,598) in view of UMEDA MASAO (Japanese Patent Publication No. JP8044632).

“To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. All words in a claim must be considered in judging the patentability of that claim against the prior art.” M.P.E.P. § 2143.03.

Amended independent claim 1 now recites, in pertinent part,

storing at least one key within a tamper detection boundary of a circuit card coupled to a system bus of a host processor;

encrypting, based upon the at least one key, one or more respective portions of write data to generate one or more respective portions of encrypted write data to be stored in one or more locations in a storage coupled to the system bus, the encrypted write data generated by an input/output (“I/O”) processor on the circuit card;

Applicants respectfully submit that the combination of Kashima and Umeda fails to disclose, teach, or suggest storing a key within a tamper detection boundary of a circuit card and generating write data based on the key with an I/O processor on the circuit card.

To be sure, Kashima discloses a RAID system, but fails to disclose or even mention any techniques for encrypting data on the RAID. The Office Action acknowledges this stating Kashima “does not expressly disclose encrypting, based upon at least one key, respective portions of write data to generate one or more respective portions of encrypted write data.” *Office Action* mailed 7/17/07, page 3.

Consequently, the Office Action cites Umeda as disclosing these missing elements. With respect to previous claims 3 and 29, the Office Action cites claim 1 and paragraphs [0011] and [0016] of Umeda as teaching the elements of these claims.

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However, these portions of Umeda disclose encryption/decryption with respect to an SCSI interface, but fail to teach or suggest storing a key within a tamper detection boundary of a circuit card. Applicants are unable to find any portion of Umeda that discloses storing a key within a portion of a circuit card that can detect tampering. Additionally, Umeda fails to disclose using an I/O processor located on a circuit card coupled to the system bus of a host processor for encrypting the write data to generate the encrypted write data based on the key stored within the tamper detection boundary of the circuit card.

Consequently, the combination of Kashima and Umeda fails to teach or suggest all elements of claim 1, as required under M.P.E.P. § 2143.03. Independent claims 5, 10, 19, 23, and 28 include similar nonobvious elements as independent claim 1. Accordingly, Applicants request that the instant § 103(a) rejections of claims 1, 5, 10, 19, 23, and 28 be withdrawn.

The dependent claims are novel and nonobvious over the prior art of record for at least the same reasons as discussed above in connection with their respective independent claims, in addition to adding further limitations of their own. Accordingly, Applicants respectfully request that the instant § 103 rejections of the dependent claims be withdrawn.

CONCLUSION

In view of the foregoing amendments and remarks, it is believed that the applicable rejections have been overcome and all claims remaining in the application are presently in condition for allowance. Accordingly, favorable consideration and a Notice of Allowance are earnestly solicited. The Examiner is invited to telephone the undersigned representative at (206) 292-8600 if the Examiner believes that an interview might be useful for any reason.

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CHARGE DEPOSIT ACCOUNT

It is not believed that extensions of time are required beyond those that may otherwise be provided for in documents accompanying this paper. However, if additional extensions of time are necessary to prevent abandonment of this application, then such extensions of time are hereby petitioned under 37 C.F.R. § 1.136(a). Any fees required therefore are hereby authorized to be charged to Deposit Account No. 02-2666. Please credit any overpayment to the same deposit account.

Respectfully submitted,

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